The Law Offices of

CICHANOWICZ CALLAN KEANE & DE MAY, LLP

50 Main Street, White Plains, NY 10606

(F) 212-344-7285

pkeane@cckd-ny.com

(T) 212-344-7042

914-682-2083

March 13, 2020

The Hon. Colleen McMahon
The United States Courthouse

500 Pearl Street, New York, NY 10007-1312

3 13 2000

RE:

REQUEST FOR ADJOURNMENT OF INITIAL CONFERENCE

Evergreen Line v. Brutos Int'l Corp., 19-cv-11273 (CM)

Your Honor:

De 2 mil

We are the attorneys for plaintiff. This letter is to request a 30-day adjournment of $\frac{3}{13}$ be the Initial Conference now scheduled for April 3rd at 10 A.M.

No prior adjournments or extensions have been granted or sought.

Opposing counsel consents to the proposed adjournment.

No Scheduling Order has been entered. The proposed adjournment would not affect any other scheduled date except for submission of the Civil Case Management Plan.

The reason for the request is that the undersigned has been contacted by an attorney for defendant to see if the case can be settled. Defendant has made an initial offer which plaintiff is reviewing. Discussions will be on a without prejudice basis as to the issue of the default. Given the relatively modest sum at issue, the possibility of settlement is increased if the parties do not have to incur attorneys' fees in litigation.

Respectfully, CICHANOWICZ CALLAN KEANE & De MAY, LLP

By:

OSEPH DeMAY

Cc:

Cameron Roberts, Esq. Roberts & Kehagiaris LLP 310-642-9800 x 7002 (T)

310-868-2923 (F)

By email to: cwr@tradeandcargo.com

Attorney for Defendant